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## Alaska Telecom Association

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February 21, 2019

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

RE: Ex parte filing in WC Docket No. 16-271

Dear Ms. Dortch:

On February 19, 2019, Christine O'Connor of the Alaska Telecom Association ("ATA"), Tim Stelzig of GCI Communication Corp., and Julie Veach of Harris, Wiltshire & Grannis LLP met with Travis Litman, Chief of Staff to Commissioner Rosenworcel. We discussed ATA's Petition for Limited Waiver,<sup>1</sup> which seeks flexibility in one of the requirements that applies to the network maps that Alaska Plan participants must file on March 1.<sup>2</sup> Specifically, the waiver seeks flexibility in the spatial accuracy requirement for buried fiber and aerial fiber links. We explained that, while the *Middle Mile Mapping Order* requires providers to certify that all data in the map are accurate to within 7.6 meters of accuracy, the providers do not have records that they can certify meet that standard for all buried and aerial fiber.

We discussed the challenges of certifying to strict levels of spatial accuracy in Alaska. First, the providers have no business reason to maintain buried and aerial fiber records to that level of spatial accuracy. Second, in many cases providers' records offer relative—not absolute—positions. They may reflect, for example, that fiber is buried along a particular street or road, rather than identifying the latitude and longitude of its position. Efforts to align providers' own relative records with other existing datasets—such as borough maps—likewise have not yielded data to within 7.6 meters of accuracy because the other maps are not certifiable to that level of accuracy.

We also discussed possible solutions. For example, we discussed whether providers might be able to certify that their data are accurate to a standard other than 7.6 meters.

Respectfully submitted,

*Via ECFS 2/19/2019*

Christine O'Connor  
Executive Director

cc: Travis Litman

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<sup>1</sup> See Petition for Limited Waiver of Alaska Telecom Association to Permit Commonly Accepted Industry levels of Spatial Accuracy for Middle Mile Fiber Route Mapping, WC Docket No. 16-271 (filed Feb. 6, 2019).

<sup>2</sup> See *Connect America Fund – Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068 (Wireline Comp. and Wireless Telecomm'n's Burs. 2018) ("*Middle Mile Mapping Order*").